

RECEIVED

NOV 27 1998

Before the

Federal Communications Commission

FCC MAIL ROOM

Washington, D.C. 20554

In the Matter of)	WT Docket No. 98-143
)	
1998 Biennial Regulatory Review--)	RM-9148
Amendment of Part 97 of the Commission's)	RM-9150
Amateur Service Rules.)	RM-9196

To: Federal Communications Commission

COMMENTS OF: Edwin C. Dow, 10790 Lower Valley Pike, Medway, Ohio 45341,
25 November 1998.

I. Introduction:

I file these comments on 25 November 1998 in the FCC's Notice of Proposed Rule Making WT Docket 98-143.

I am currently retired. During college and a few years following I was the holder of an amateur radio operating license, which lapsed many years ago. This year I obtained a Technician license, which I recently upgraded to Technician Plus.

II. SUMMARY:

- I recommend modifying the Amateur Radio Service rules as follows:
- Reduce the number of license classes from 6 to 3. (i.e. Technician, General and Extra).
- Phase out the Novice and Technician Plus licenses with the current licenses being grandfathered.
- Phase out the Advanced license class and combine it with the Extra Class.
- Reduce the code requirements significantly. i.e. 5 WPM for General Class, 10 WPM for the Extra Class.
- Update the written tests to include consideration for the newer technologies.
- Keep the current procedures in place for the written and code examinations.
- Modify the frequencies for the newly recommended 3 classes.

No. of Copies rec'd
List ABCDE

045

ORIGINAL

- I propose an alternate approach to privatization of certain Enforcement Procedures.

- Expand the Voluntary Examiner opportunities as proposed, plus the additional monetary increase in the reimbursement level.

- Phase out the RACES Station licenses by not renewing them.

III. Number of License Classes

I recommend reducing the number of license classes from 6 to 3. i.e. Technician, General and Extra.

a. **New Technician Class:** The operating privileges shall include all current operating privileges for the current no-code Technician Class. i.e. 6, 2, 1.25, .70, .33 and .23 meter bands. I recommend No Code test for this class. The updated written tests shall be expanded to include additional technical content associated with the newer technologies. Although currently inconsistent with the International Radio Regulations, I also recommend that consideration be given to adding future operating privileges below 30MHz. Specifically, I recommend small, specific frequency allocations in portions of the 10, 12, 15, 17 and 160 meter phone bands at a reduced power level. i.e. 50 watts. My rationale for these recommendations in the Technician Class is to make it a true entry level amateur Radio class as an introduction to a wider range of operating frequency experiences.

b. **New General Class:** The new General Class operating privileges shall be the same as for the current General Class holders. The new written test should be expanded for increased technical content and the newer technologies. The Morse Code requirements should be reduced from 13 words per minute (WPM) to 5 WPM.

c. **New Extra Class:** The new Extra Class operating privileges shall be keep the same as the existing Extra Class. The new written test should be

expanded for increased technical content and the newer technologies. The code requirements should be reduced from 20 WPM to 10 WPM.

d. **Titles:** I recommend keeping the same titles for the new, revised classes, i.e. Technician, General and Extra. Converting to a numerical class line-up, (i.e. 1, 2, 3, etc.) or an alphabetic class line-up (i.e. A, B, C, etc.) is not recommended. My rationale for this is that (1) the FCC would not have to re-issue license documents with new names and (2) It would be unwieldy and ADD to the administrative burden, which is contrary to the basic recommendation of this Notice of Proposed Rule Making to reduce the administrative load.

IV. Disposition of Current License Classes

I recommend phasing out the current Novice class. The current holders of Novice class operator licenses shall be grandfathered with the current licensed holders being able to renew and/or upgrade to a higher class with proper credit for the current proficiency.

I recommend phasing out the current Technician Plus class. The current holders of the technician Plus class operator licenses shall be grandfathered with the current holders being able to renew and/or upgrade to a higher class with proper credit for the current proficiency.

I recommend phasing out the current Advanced Class. The current holders of the Advanced class operator licenses shall be grandfathered with the current license holders being able to renew and/or upgrade to a higher class with proper credit for the current proficiency. If the Extra class code requirements are reduced then I recommend an automatic upgrade to the Extra class license category.

V Disposition of the Novice and Technician Plus Bands

If the Novice and Technician Plus license classes are phased out I recommend that their frequency allocations be deleted and re-distributed. However, these operators should continue to be limited to 200 watts power limitation.

VI. Telegraphy Examination Requirements

I recommend a de-emphasis in requiring testing for correctly receiving Morse code telegraphy. Morse code is a secondary means of communications. However, it is still a valid asset for emergency communications. Satellites are reliable, but have been known to fail. Also, the radio equipment required to send and receive Morse code is more economical than voice, etc. equipment. Equipment cost is a major factor to those of us on a limited and/or fixed income.

In view of the above and the changes in technologies used by amateurs for communications, I recommend the following changes in the Morse code requirements. (1) Only 2 levels of testing is recommended, 5 WPM and 10 WPM. (2) Delete the Farnsworth's method of code generation for the 5 WPM test. The only value of Farnsworth is an aid to copy the higher code speeds. Personally, although I can copy Regular 5 WPM code, the Farnsworth 5 WPM test was extremely difficult. Finally with a de-emphasis on Morse code, Farnsworth is not needed.

I recommend that the method of examining for Morse code proficiency be left to the Voluntary Examiners to determine. In my case in taking the 5 WPM code test for Technician Plus a fill-in-blank test sheet was used, with the back up approach being used was the perfect copying of one out of 5 minutes sent. Since communication is the goal, just copying 1 minute of perfect code, but missing the other 4 minutes, is not necessarily communication.

The New Technician Class Amateur Radio license should be a codeless class. The General Class Morse code requirements should be reduced from 13 WPM to 5 WPM. All classes higher than General should be limited to 10 WPM. It should be noted that just because I recommend lowering the code requirements, that does not mean that any amateur can't choose to operate at a higher speed.

VII. Privatization of Certain Enforcement Procedures

I agree that improved enforcement of the Amateur Service Rules is desired. A possible alternate approach is suggested that would be similar to a neighborhood crime watch activity. i.e. by analogy, the Amateur Auxiliary is composed of amateur operators who are recruited and trained by the FCC for the purpose of detecting, on a voluntary and uncompensated basis, improper radio transmissions. Any improper radio activity observed by this amateur auxiliary group will be recorded and categorized. I would recommend categorizing these infractions by severity and a rating system. I would suggest a point rating system similar to the point system used by law enforcement to assess point penalties associated with traffic violations. Advisory notices (i.e. generated by these amateur auxiliary members) are issued to persons who have violated the Amateur Service Rules. This information is also furnished to the FCC. When a person engaging in an improper radio operation exceeds the pre-determined number of points, then the case is forwarded to the Chief Administrative Law Judge (CALJ) for appropriate official legal action. I believe this would minimize the FCC paper-work and maximize the effectiveness of any official, legal action. Also, regular publication and/or public press releases to regularly published magazines of these legal actions should emphasize the necessity to follow the rules.

VIII. Greater Volunteer Examiner Opportunities

I concur with the proposal to expand the opportunities for Volunteer Examiners. I would add the suggestion to increase the allowed collected fees significantly above the current level of \$6.35. Volunteer Examiners have other demands on their time and a higher fee schedule would be a tangible acknowledgement of the service they perform. A typical test period conducted by the Volunteer Examiner lasts about 3 to 4 hours. At a minimum, this translates into a reimbursement of more than twice the current fee schedule.

IX. RACES Station Licenses

I recommend phasing out RACES Station licenses by not renewing them.

X. Written Examinations

I recommend keeping the current procedures in place.

XI. An Additional Suggestion

The International Radio Regulations that apply to the Amateur Radio Service require that all amateur licensed to operate below 30 MHz demonstrate their ability "to send correctly by hand and to receive correctly by ear, texts in Morse code signals." This is given as a rationale that Amateur's can't operate in the designated amateur bands below 30 MHz. However, even though we are tested to verify the correct reception of Morse code, I am not aware that anybody requires a test to prove they can SEND Morse code. It is assumed that if you can receive Morse code, you can also send it. I'm sure the Commission is well aware that Morse code is not always being sent in a clearly, understood form. Yet this skill is not verified. In view of this inconsistency in selectively requiring verification of code reception, but not requiring proof of sending code I would suggest that the Volunteer Examiner could be allowed to also pass on verifying code reception. In fact, technology is available to send and receive Morse code without using a sending key! Thus, a person could operate on the code frequencies with this equipment. Therefore, I would suggest operation on these frequencies be permitted by the appropriate technology in addition to a hand key.

Respectfully submitted by:



Edwin C. Dow, K8YDZ

10790 Lower Valley Pike

Medway, Ohio 45341

25 November 1998

ORIGINAL